

Eric A. Liepins
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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE §
§
DFW BOAT SPECIALIST, LLC § CASE 23-40316
§
DEBTOR §

MOTION FOR SETTING AND REQUEST FOR EMERGENCY HEARING ON MOTION TO
COMPEL DELIVERY OF FUNDS

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, DFW Boat Specialists, LLC ("Debtor") and files this its Request for
Emergency Hearing on the Debtor's Motion to Compel Delivery of Funds.

The Debtor operates an automobile dealership in Denton, Texas. On or about March 3, 2023
Debtor sold three vehicles to customers who financed the vehicles with Westlake Financial.
Westlake has failed and refused to deliver the funds by Debtor on the sales of the vehicles. The funds
are necessary for the operations of the Debtor. Despite the notice of the bankruptcy filing and the
request to release the funds, Westlake has failed and refused to deliver the funds to the Debtor.
Debtor seeks an expedited hearing on before March 7, 2023.

Respectfully submitted,

/s/ Eric Liepins _____
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PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent via e-mail to Westlake Financial 4751 Wlshire Blvs. Suite 100, Los Angeles CA 90010 and e-mail at Westlake Cusomer care@westlakefinancial.com and by and throufght its attoerny of record, James Liebler at JRLII@lgplaw.com on the 6th day of march 2023.

/s/ Eric Liepins _____
Eric A. Liepins

UNSWORN DECLARATION OF ERIC A. LIEPINS IN SUPPORT OF DEBTOR'S
EMERGENCY MOTION TO COMPEL

1. My name is Eric A. Liepins. I submit this Declaration in support of the Debtor's Motion to Compel Release of Pre-Judgment Sequestration. I am over the age of 21 years and of sound mind. I have personal knowledge of all facts set forth herein, and they are true and correct.
2. I am an attorney licensed to practice in the State of Texas since 1987 and admitted in the United States District and Bankruptcy Courts for the Eastern District of Texas.
3. On January 31, 2023 I filed this bankruptcy proceeding for the Debtor.
4. The Debtor operates an automobile dealership and sells vehicles for finance its operations.

5. On or about March 3, 2023, debtor sold three vehicles.
6. The customers who purchased the vehicles obtained financing through Westlake Financial ("Westlake").
7. Westlake is currently holding \$18,090.66 of debtor's funds which it has refused to deliver to the Debtor.
8. I contacted James Liebler counsel for Westlake requesting th funds, but have not been advised that the funds will be released.

 /s/ Eric Liepins _____
Eric Liepins